

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MARGARET CRAIG, as next of)
kin and personal)
representative of the estate)
of Angela Hulsey,)
)
 Plaintiff)
)
vs.) Case No. 3:17-cv-01335
) JURY DEMAND
) JUDGE CAMPBELL
CHEATHAM COUNTY, TENNESSEE,) MAGISTRATE HOLMES
BEN MOORE, MARK BRYANT,)
STEPHANIE GIZZI-BELL, JESSICA)
PLANK, et al.,)
)

Defendants

The deposition of

MIKE MONTGOMERY

December 12, 2018

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1 Q. So that looks like that was about 2014
2 roughly?

3 A. Yes, sir.

4 Q. All right. And when you left in 2017, were
5 you still a corporal?

6 A. I was.

7 Q. Okay. So there's nothing else we need to add
8 to the advancement history. Right?

9 A. No, sir.

10 Q. All right. Tell me about your training then,
11 what you received in terms of training when you were
12 hired in in 2007.

13 A. It was very minimal. I was basically handed
14 the keys, told don't let anybody out, and if you have
15 any question, ask that inmate.

16 Q. Was there an inmate that had been there long
17 enough to know the procedures?

18 A. Yeah.

19 Q. I'll ask specifically then about some type of
20 training to the extent that there was given any.

21 Did you ever receive any CPR training or first
22 aid through the jail?

23 A. I did.

24 Q. All right. Was that initially, or was it
25 later?

1 A. I want to say 2017.

2 Q. Okay. And --

3 A. I did have in my first year the 40 hours of
4 basic that's required by the State.

5 Q. Uh-huh.

6 A. And then every year after that I had the 16
7 hours that was required by the State.

8 Q. All right. But in terms of any kind of
9 medical training that was provided in any of those
10 courses, the CPR, first aid, that was provided to the
11 best of your recollection in 2017?

12 A. Correct.

13 Q. Okay. What about any training in identifying
14 or dealing with intoxicated inmates or detainees?

15 A. No, sir.

16 Q. What about inmates or detainees that are
17 detoxing or withdrawing?

18 A. No official training, no, sir.

19 Q. All right. Any unofficial training?

20 A. I mean, you could tell most of the time if
21 someone was withdrawing just because you were around it
22 so much. But, I mean, that was just something that was
23 kind of self-taught that, hey, this person is going
24 through this, we need to let a nurse know.

25 Q. All right. What would -- based on your

1 experience and observation, what would be the things
2 that would tip you off that, hey, this person is
3 detoxing or withdrawing?

4 A. Upset stomach, diarrhea, refusing food,
5 sweating, and vomiting. Not necessarily all of them but
6 a combination of.

7 Q. All right. And some of those could also be
8 symptoms of illnesses, so let me ask this question:
9 What training, if any, did you receive regarding
10 identifying detainees or inmates that had some type of
11 illness?

12 A. None.

13 Q. Did you know Ms. Hulsey?

14 A. I knew the name.

15 Q. Did you know any of her family?

16 A. No, sir.

17 Q. What specific interaction do you recall having
18 with Ms. Hulsey in October of 2016?

19 A. None.

20 Q. All right. And I'll do the same thing. I'm
21 going to hand you the Observation Log and the Medical
22 Watch Log, and if you can, go through there. And if you
23 see your initials, you are the fifth deposition we've
24 taken, so put a number 5 next to that.

25 A. (Complies.)